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Attorneys for Defendant Coinbase, Inc.

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KENNETH LIEBSCHER, an individual,

 Plaintiff,

v.

COINBASE, INC., a Delaware corporation;
 Does I through X, inclusive; and ROE
 ENTITIES XI through M, inclusive,

 Defendant.

Case No. 2:24-cv-00148-RFB-EJY

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1, Defendant Coinbase, Inc. (“Coinbase” or “Defendant”), by counsel, respectfully requests a twenty-eight (28) day enlargement of the time to respond to the Complaint of Plaintiff Kenneth Liebscher in this action (“Plaintiff”). In support thereof, Coinbase states:

1. On August 28, 2023, Plaintiff filed his Complaint in the Eighth Judicial District Court in and for Clark County, Nevada.
2. On December 21, 2023, Coinbase was served with the Complaint.
3. On January 22, 2024, Coinbase timely removed the action to this Court. ECF No. 1.
4. The undersigned was just recently retained in this action, and requires additional time to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff’s Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit a proper response to the Complaint. In addition, the requested enlargement of time will permit Defendant to identify the account and complete its research. For these reasons, Defendant

1 respectfully requests a twenty-eight (28) day extension of time -- i.e., through and including
2 February 26, 2024 -- within which to respond to Plaintiff's Complaint.

3 5. This motion is made in good faith and not for purposes of undue delay. No party
4 will be prejudiced by the relief sought. This is Defendant's first request for extension of time.

5 6. Counsel for Defendant conferred with counsel for Plaintiff regarding the extension
6 of time requested herein, who confirmed that Plaintiff does not oppose the relief sought.

7 WHEREFORE, Defendant Coinbase respectfully requests that the Court grant this
8 Unopposed Motion and extend the time for Coinbase to respond to the Complaint by and through
9 February 26, 2024.

10 DATED this 23rd day of January, 2024.

11
12 LEWIS ROCA ROTHGERBER CHRISTIE LLP

13 By: /s/ Brittni A. Tanenbaum

14 J Christopher Jorgensen (SBN: 5382)

15 Brittni A. Tanenbaum (SBN: 16013)

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17 *Attorneys for Defendant Coinbase, Inc.*

18
19 **ORDER**

20 **IT IS SO ORDERED.**

21
22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATE: January 23, 2024